

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2013 Grand Jury

CR14-0041

UNITED STATES OF AMERICA,

CR No. 14-

Plaintiff,

I N D I C T M E N T

v.

[18 U.S.C. § 1956(a)(1)(B)(i):
Money Laundering]

KAREN AHARONIAN,
aka "Michael 3,"

Defendant.

The Grand Jury charges:

COUNTS ONE THROUGH SEVEN

[18 U.S.C. § 1956(a)(1)(B)(i)]

1. On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, defendant KAREN AHARONIAN, also known as "Michael 3" ("defendant AHARONIAN"), knowing that the property involved in each of the financial transactions described below represented the proceeds of some form of unlawful activity, attempted to conduct and conducted the following financial transactions involving the use of a financial institution, which transactions involved the proceeds of specified unlawful activity, namely, mail and wire fraud, in violation of Title 18,

United States Code, Sections 1341 and 1343, knowing that each of the transactions was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity:

COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
1	8/26/10	Transfer of the following two tax refund checks: a. \$8,638 check in the name of L.V.; and b. \$12,599 check in the name of Q.H.	mail fraud involving the submission of false and fraudulent tax returns resulting in the issuance of tax refund checks sent by United States mail
2	8/28/10	Transfer of the following three tax refund checks: a. \$13,370 check in the name of S.L.; b. \$11,466 check in the name R.H.; and c. \$8,239 check in the name of T.L.	mail fraud involving the submission of false and fraudulent tax returns resulting in the issuance of tax refund checks sent by United States mail
3	3/27/12	Transfer of the following nine tax refund checks: a. \$8,127 check in the name of R.K.; b. \$8,127 check in the name of A.S.; c. \$8,127 check in the name of A.O.; d. \$8,127 check in the name of M.S.; e. \$8,127 check in the name of I.R.; f. \$2,890.76 check in the name of J.Y.; g. \$407.30 check in the name of S.S.; h. \$8,127 check in the name of S.S.; and	mail fraud involving the submission of false and fraudulent tax returns resulting in the issuance of tax refund checks sent by United States mail

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		i. \$8,127 check in the name of A.A.	
4	9/05/12	Transfer of the following checks: a. checks numbered 1017 through 1020 written on the Charlie White Trucking account xxxx xxxx 3683 at Bank of America; b. checks numbered 5208 through 5211 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; c. checks numbered 1269 through 1272 written on the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America;	a. wire fraud involving the submission of false and fraudulent tax returns resulting in the issuance of a tax refund in the amount of \$12,335.71 in the name of A.K. and a tax refund in the amount of \$20,055.49 in the name of R.G. sent by interstate wire to the Charlie White Trucking account xxxx xxxx 3683 at Bank of America b. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$16,800.64 in the name of D.S. sent by interstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America c. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$20,140.45 in the name of S.R. sent by interstate wire to the Kogut Best Opportunities account xxxx xxxx 6562 at Bank of America

COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
		d. checks numbered 1610 through 1613 written on the Adams Trucking account xxxx xxxx 0059 at Bank of America;	d. wire fraud involving the submission of false and fraudulent tax returns resulting in the issuance of a tax refund in the amount of \$24,115 in the name of L.W. and a tax refund in the amount of \$23,120 in the name of J.R. sent by interstate wire to the Adams Trucking account xxxx xxxx 0059 at Bank of America
		e. checks numbered 1508 and 1509 written on the Ignatova Design account xxxxx-x6358 at Bank of America;	e. wire fraud involving the submission of false and fraudulent tax returns resulting in the issuance of a tax refund in the amount of \$14,860 in the name of A.A. and a tax refund in the amount of \$8,349 in the name of R.H. sent by interstate wire to the Ignatova Design account xxxxx-x6358 at Bank of America
		f. checks numbered 1140 through 1143 written on the Shaver Distribution account xxxx xxxx 7685 at Bank of America; and	f. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$24,562 in the name of W.W. sent by interstate wire to the Shaver Distribution account xxxx xxxx 7685 at Bank of America
		g. checks numbered 1666 through 1669 written on the Kosheleva Wholesale account xxxx xxxx 6361 at Bank of America.	g. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$23,640 in the name of J.K. sent by interstate wire to the

COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
			Kosheleva Wholesale account xxxx xxxx 6361 at Bank of America
5	9/14/12	Transfer of the following checks: a. checks numbered 1011 through 1016 written on the Torres Trucking account xxxx xxxx 8247 at Bank of America; b. checks numbered 1010 through 1012 written on the Jaynes Fire Extinguishers account xxxx xxxx 4646 at Bank of America; c. checks numbered 1007 through 1010 written on the Castle Printing account xxxx xxxx 5674 at Bank of America;	a. wire fraud involving the submission of false and fraudulent tax returns resulting in the issuance of a tax refund in the amount of \$8,312.47 in the name of E.A. and a tax refund in the amount of \$26,545 in the name of D.H. sent by interstate wire to the Torres Trucking account xxxx xxxx 8247 at Bank of America b. wire fraud involving the submission of false and fraudulent tax returns resulting in the issuance, of a tax refund in the amount of \$12,103.58 in the name of M.S. and a tax refund in the amount of \$14,332 in the name of D.T. sent by interstate wire to the Jaynes Fire Extinguishers account xxxx xxxx 4646 at Bank of America c. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$21,004 in the name of J.M. sent by interstate wire to the Castle Printing account xxxx xxxx 5674 at Bank of America

COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
		d. checks numbered 5212 through 5214 and 5216 written on the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America; and	d. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$21,155 in the name of A.B. sent by interstate wire to the Juarez JJ Painting account xxxx xxxx 8364 at Bank of America
		e. checks numbered 1214 through 1217 written on the Michael Custom Printing account xxxx xxxx 8464 at Bank of America.	e. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$22,290 in the name of D.G. sent by interstate wire to the Michael Custom Printing account xxxx xxxx 8464 at Bank of America
6	10/4/12	Transfer of the following checks: a. checks numbered 1014 and 1015 written on the Millsap Trucking account xxxx xxxx 5043 at Bank of America; and b. checks numbered 2018 through 2022 written on the Matthew Sims Accounting account xxxx xxxx 0926 at Bank of America.	a. wire fraud involving the submission of false and fraudulent tax returns resulting in the issuance of a tax refund in the amount of \$19,340.38 in the name of P.B. and a tax refund in the amount of \$9,611.39 in the name of R.Q. sent by interstate wire to the Millsap Trucking account xxxx xxxx 5043 at Bank of America b. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$25,501 in the name of M.G. sent by interstate wire to the

COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
			Matthew Sims Accounting account xxxx xxxx 0926 at Bank of America
7	10/30/12	Transfer of the following checks: a. checks numbered 327 through 333 written on the Oscar Villalta account xxxx xxxx 5865 at Bank of America; b. checks numbered 1512 through 1514 written on the Ignatova Design account xxxxx-x6358 at Bank of America; c. checks numbered 2002 and 2006 through 2008 written on the Bocharov Electric Service account xxxxx- x2202 at Bank of America;	a. wire fraud involving the submission of false and fraudulent tax returns resulting in the issuance of a tax refund in the amount of \$25,499 in the name of K.A. and a tax refund in the amount of \$25,499 in the name of S.P. sent by interstate wire to the Oscar Villalta account xxxx xxxx 5865 at Bank of America b. wire fraud involving the submission of false and fraudulent tax returns resulting in the issuance of a tax refund in the amount of \$23,625 in the name of M.G., a tax refund in the amount of \$24,339 in the name of K.G., a tax refund in the amount of \$23,625 in the name of L.V. and a tax refund in the amount of \$23,625 in the name of D.T. sent by interstate wire to the Ignatova Design account xxxxxx-x6358 at Bank of America c. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$17,408.85 in the name of L.M. sent by interstate wire to the Bocharov Electric Service


COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
1			account xxxxx-x2202 at Bank
2			of America
3		d. checks numbered	d. wire fraud involving the
4		1011 through 1014	submission of a false and
5		written on the Castle	fraudulent tax return
6		Printing account xxxx	resulting in the issuance
7		xxxx 5674 at Bank of	of a tax refund in the
8		America; and	amount of \$18,032 in the
9			name of A.P. sent by
10			interstate wire to the
11			Castle Printing account
12			xxxx xxxx 5674 at Bank of
13			America
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COUNT	DATE	FINANCIAL TRANSACTION	SPECIFIED UNLAWFUL ACTIVITY
		e. checks numbered 1014 through 1016 written on the Sexton Consulting account xxxx xxxx 4911 at Bank of America.	e. wire fraud involving the submission of a false and fraudulent tax return resulting in the issuance of a tax refund in the amount of \$15,158 in the name of S.B. sent by interstate wire to the Sexton Consulting account xxxx xxxx 4911 at Bank of America

A TRUE BILL

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Foreperson

ANDRÉ BIROTTE JR.
United States Attorney



ROBERT E. DUGDALE
Assistant United States Attorney
Chief, Criminal Division

STEPHEN A. CAZARES
Assistant United States Attorney
Acting Chief, Major Frauds Section

JILL FEENEY
Assistant United States Attorney
Deputy Chief, Major Frauds Section